

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI  
OXFORD DIVISION**

**IN RE:** : **CASE NO: 18-13263-JDW**  
: **CHAPTER: 13**  
:  
**RHONDA K SPEARMAN** :  
**TRACY D SPEARMAN,** :  
: **Debtors.** :

**RHONDA K SPEARMAN**  
**TRACY D SPEARMAN,**  
  
**Movant,**  
  
**vs.**  
  
**REGIONS BANK D/B/A REGIONS**  
**MORTGAGE,**  
  
**Respondent.**

:  
:  
:  
: **CONTESTED MATTER**  
:  
:  
:  
:  
:  
:  
:

## **RESPONSE TO OBJECTION TO NOTICE OF MORTGAGE PAYMENT CHANGE**

COMES NOW Regions Bank d/b/a Regions Mortgage, for itself, its successors and/or assigns ("Respondent"), and shows this Honorable Court that, for the reasons set out below, the Court should deny the Debtors' Objection to Notice of Mortgage Payment Change ("Objection"):

1.

Respondent filed a Notice of Mortgage Payment Change on July 25, 2019 (Dkt. #43) listing a new post-petition payment amount of \$542.85 effective with the September 1, 2019 payment. The Debtors objected to the Notice of Mortgage Payment Change stating there were issues with the escrow portion of the new mortgage payment amount.

2.

Respondent is currently reviewing the mortgage account and the issues asserted in the pending Objection. Respondent respectfully requests additional time to review the issues raised in the Debtors' Objection.

WHEREFORE, Respondent, for itself, its successors and/or assigns, prays that this Court inquire as to the matters raised herein and deny the Debtors' Objection to Notice of Mortgage Payment Change and enter such orders and require such further inquiry as may appear appropriate to the Court.

Dated: 9/6/19

/s/ Natalie Brown  
Natalie Brown  
MS State Bar No. 100802  
Rubin Lublin, LLC  
428 North Lamar Blvd, Suite 107  
Oxford, MS 38655  
(877) 813-0992  
nbrown@rubinlublin.com  
Attorney for Respondent

CERTIFICATE OF SERVICE

I, Natalie Brown of Rubin Lublin, LLC certify that on the 6th day of September, 2019, I caused a copy of the Response to Objection to Notice of Mortgage Payment Change to be filed in this proceeding by electronic means and to be served by depositing a copy of the same in the United States Mail in a properly addressed envelope with adequate postage thereon to the said parties as follows:

Rhonda K Spearman  
371 Brower Rd.  
Coffeerville, MS 38922

Tracy D Spearman  
371 Brower Rd.  
Coffeerville, MS 38922

Robert Gambrell, Esq.  
Gambrell & Associates, PLLC  
101 Ricky D Britt Blvd.  
Suite 3  
Oxford, MS 38655

Locke D. Barkley  
6360 I-55 North  
Suite 140  
Jackson, MS 39211

U.S. Trustee  
501 East Court Street  
Suite 6-430  
Jackson, MS 39201

Executed on 9/6/19

By: /s/ Natalie Brown  
Natalie Brown  
MS State Bar No. 100802  
Rubin Lublin, LLC  
428 North Lamar Blvd, Suite 107  
Oxford, MS 38655  
(877) 813-0992  
nbrown@rubinlublin.com  
Attorney for Respondent